## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO

CARL FORSELL		)
		) Case No: 22-cv-01454
		) Case 110. 22-cv-01434
		) Judge: Sara Lioi
	Plaintiff,	)
Vs.		) Magistrate Judge: Carmen Henderson
SQUIRRELS, LLC, et al.		)
	D = 6	)
	Deien	idants.

## JOINT STATUS REPORT

The parties, by and through respective undersigned counsel and pursuant to the Court's Amended Case Management Order entered on September 10, 2024, hereby respectfully submit the following Joint Status Report:

- Status of Discovery: The parties have exchanged written discovery. There are outstanding discovery responses due from Defendant Squirrels, LLC in response to Plaintiff's written discovery. Plaintiff will be following up on those requests in accordance with Fed. R.
   Civ. P. 37 and Local Rule 37.1. The discovery cutoff is January 31, 2025, and at this time the parties anticipate having all discovery completed by this date.
- 2. Outstanding Motions: There are no outstanding motions before the Court.
- Case Schedule: At this time the parties believe that there is no reason to deviate from the
  case schedule as set forth in the Amended Case Management Order entered on September
  10, 2024.

4. Mediation and Settlement: A Settlement Conference was conducted on September 3, 2024 with a follow up conference conducted on September 18, 2024. An agreement was ultimately reached between Plaintiff and Defendant Allmine, Inc. that will result in Allmine's dismissal from this case. Plaintiff and Defendant Squirrels, LLC did not resolve their dispute. Plaintiff's demand remains what he is allegedly due and owing based upon the transactions underlying this action as prayed for in the Complaint. The balance totals \$774,373.60. He would be willing to compromise this demand in the event a good faith effort is made on the part of Squirrels, LLC to settle the dispute.

Respectfully submitted,

/s/- Thomas L. Sooy
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SUBMITTED FOR REVIEW ON 12/18/24

Jessica Gibson, Esq. Finney Law Firm, LLC 4270 Ivy Pointe Blvd., Ste. 225 Cincinnati, OH 45245 Attorney for Defendant Allmine, Inc.

## SUBMITTED FOR REVIEW ON 12/18/24

Jack B. Cooper, Esq Milligan Pusateri Co., LPA 4684 Douglas Circle NW Canton, OH 44735 Attorney for Defendant Squirrels, LLC

## **CERTIFICATE OF SERVICE**

I hereby certify that on December 20, 2024, I electronically filed the Joint Status Report with the Clerk of the Court using the ECF system, which notified the following participants:

Jack B. Cooper, Esq Milligan Pusateri Co., LPA 4684 Douglas Circle NW Canton, OH 44735 Attorney for Defendant Squirrels, LLC

Jessica D. Gibson, Esq. Christopher P. Finney, Esq. Finney Law Firm, LLC 4270 Ivy Pointe Blvd., Ste. 225 Cincinnati, OH 45245 Attorney for Defendant Allmine, Inc.

/s/- Thomas L. Sooy, Esq.